

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

COREY LONG)	JURY TRIAL DEMANDED
Plaintiff,)	
)	
v.)	Case No.CIV-24-173-J
)	
PORTFOLIO RECOVERY ASSOCIATES,)	
LLC.,)	
Defendant.)	
)	

COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for actual and statutory brought by Plaintiff Corey Long an individual consumer, against Defendant, Portfolio Recovery Associates, LLC., (“PRA”) for violations of the Fair Debt Collection Practices Act, 15 U.S.C § 1692 *et seq.* (hereinafter “FDCPA”), which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

II. JURISDICTION AND VENUE

2. Jurisdiction of this court arises under 15 U.S.C § 1692k(d) 28 U.S.C 1331. Venue in this District is proper in that the Defendants transact

business in Oklahoma City, Oklahoma County, Oklahoma, and the conduct complained of occurred in Oklahoma City, Oklahoma County, Oklahoma.

III. PARTIES

3. Plaintiff Corey Long (hereinafter “Mr. Long”) is a natural person residing in Oklahoma City, Oklahoma County, Oklahoma. Mr. Long is a consumer as defined by the Fair Debt Collection Practices Act, 15 U.S.C. §1692a(3).
4. Upon information and belief, Defendant Portfolio Recovery Associates, LLC is a Virginia corporation with its principal place of business located at 120 Corporate Blvd, Norfolk, VA 23502.
5. Defendant Portfolio Recovery Associates, LLC is engaged in the collection of debt from consumers using the mail and telephone. Defendant regularly attempt to collect consumers’ debts alleged to be due to another’s. The alleged debt arose from a financial obligation that was primarily for personal, family or household purposes and is therefore a “debt as that term is defined by 15 U.S.C. §1692a(5).

IV. FACTS OF THE COMPLAINT

6. Defendant Portfolio Recovery Associates, LLC., (hereinafter referred to as “Debt Collector”) is a “debt collector” as defined by the FDCPA, 15 U.S.C 1692a(6).
7. On or about January 30, 2024, Mr. Long reviewed his credit report on credit karma and saw Defendant attempting to collect a debt for Capital One.
8. On or about January 30, 2024 Plaintiff wrote letter to Defendant stating “I ran out of money. I refuse to pay.”
9. Defendant received Plaintiff letter via certified mail.
10. On about February 6, 2024 received a letter from Defendant attempting to collect the alleged debt above by giving Plaintiff payment options. Which was in violation of 15 U.S.C 1692c(c).
11. Plaintiff has suffered actual damages as a result of these illegal collection communications by these Defendant in the form of anger, anxiety, intrusion upon seclusion, decreased ability to focus on task while at work, frustration, amongst other negative emotions.

V. FIRST CLAIM FOR RELIEF
(Defendant Portfolio Recovery Associates Corp)
15 U.S.C. §1692c(c)

12. Mr. Long re-alleges and reincorporates all previous paragraphs as if fully set out herein.

13. The Debt Collector violated the FDCPA.
14. The Debt Collector's violations include, but are not limited to, the following:

The Debt Collector violated 15 U.S.C § 1692c(c) of the FDCPA by failing to cease collection after receiving written notice.

15. As a result of the above violations of the FDCPA, Defendant are liable to the Mr. Long actual damages, statutory damages and cost.

VI. JURY DEMAND AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff Mr. Long respectfully demands a jury trial and requests that judgment be entered in favor of Plaintiff and against the Debt Collector for:

- A. Judgment for the violations occurred for violating the FDCPA;
- B. Actual damages pursuant to 15 U.S.C 1692k(a)(1)(2);
- C. Statutory damages pursuant to 15 U.S.C 1692k(a)(2);
- D. Cost and reasonable attorney's fees pursuant to 15 U.S.C 1692k(a)(3);
- E. For such other and further relief as the Court may deem just and proper.

Respectfully submitted:

s/ Nkem A. House

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